

GERSTEIN HARROW LLP

Hon. Frederic Block
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Via ECF

Re: Request for Rule 16 Conference in Kent v. PoolTogether, et al., No. 21-CV-6025-FB-CLP

Dear Judge Block,

My firm represents Joseph Kent, the Plaintiff in this matter.

We write to alert the Court that Defendants noticed their intent to move to dismiss Plaintiff's complaint in this matter on January 18, 2022, and that the Defendants' motions to dismiss have been fully briefed since June 17, 2022. Pursuant to Rule 16, "[t]he judge must issue the scheduling order as soon as practicable, but unless the judge finds good cause for delay, the judge must issue it within the earlier of 90 days after any defendant has been served with the complaint or 60 days after any defendant has appeared." *See* Fed. R. Civ. P. 16(b)(2). We therefore request a Rule 16 conference as soon as practicable.

Sincerely,
Charlie Gerstein
April 19, 2023